

**APPENDIX B**

**DISCOVERY PLAN WORKSHEET**

**Tier I Pre-Settlement Discovery  
TO BE COMPLETED IN ALL CASES**

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:

November 10, 2023

Completion date for Phase I Discovery

November 10, 2023

as agreed upon by the parties:

(*See paragraph 7 of joint letter requirement*)

Status conference TBD by the court:

November 27, 2023

(*Generally 15 days post Tier I Discovery*)

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:

December 7, 2023

(*Presumptively 15 days post status conference*)

All fact discovery completed by:

September 9, 2024

(*Presumptively 9 months after deadline for joining parties/amend the pleadings*)

Expert discovery completed by:

December 6, 2024

(*Presumptively 3 months after close of fact discovery*)

Final date to take first step in dispositive motion practice:

January 6, 2025

(*Parties are directed to consult the District Judge's individual rules regarding such motion practice.*

(*Presumptively 30 days after close of discovery*)

Joint Proposed Pretrial Order to be

February 5, 2025

submitted:

(*30 days after dispositive motion*

*practice deadline*)